

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF  
MISSISSIPPI  
JACKSON – NOTHERN DIVISION

THE ESTATE OF CYRSTALLINE BARNES  
ET AL.

PLAINTIFFS

V.

CIVIL ACTION NO.: 18-644

OFFICER RAKASHA ADAMS  
ET AL.

DEFENDANTS

**LINE**

COMES NOW, The Estate of Crystalline Barnes, minor child, J.H., and minor child K.B., by and through Lenda Burns, the personal representative of the foregoing Estate and the legal guardian of the foregoing minor children (collectively, “Plaintiffs”), by and through their undersigned counsel, hereby filing this *Line*, and would show unto the Court, the following:

1. Pursuant to this Court’s Order dated December 16, 2019, Plaintiffs submit the following summary of relevant matters anticipated to be discovered in the recorded statements of Jackson Police Department IAD files Nos.: 470-12, 232-13 and 239-16.

- a. Any and all statements regarding and or related to the Jackson Police Department’s training, policies, procedures and or practices.
- b. Any and all statements regarding and or related to the shooting of a suspect by any officer of the Jackson Police Department in each matter.
- c. Any and all statements regarding and or related to the shooting of a suspect by any officer of the Jackson Police Department in any prior matter.
- d. Any and all statements regarding and or related to authorization, justification, permission and or cause for any action by any officer of the Jackson Police Department taken in each matter.

- e. Any and all statements regarding and or related to any investigation, interviews, analysis and or reviews conducted by or on behalf of the Jackson Police Department in each matter.
- f. Any and all statements regarding and or related to the circumstances of the investigation in each matter.
- g. Any and all statements regarding and or related to the use of excessive force in each matter.
- h. Any and all statements regarding and or related to the use of excessive force in any prior matters.
- i. Any and all statements regarding and or related to the use of lethal force in each matter.
- j. Any and all statements regarding and or related to the use of lethal force in any prior matters.
- k. Any and all statements regarding and or related to the use of any force in each matter.
- l. Any and all statements regarding and or related to the use of any force in any prior matters.
- m. Any and all statements regarding and or related to any and all disciplinary measures or actions considered, imposed and or declined by the Jackson Police Department in each matter.
- n. Any and all statements regarding and or related to supervision or lack thereof by the Jackson Police Department.

- o. Any and all statements regarding and or related to any customs and or norms of the Jackson Police Department.
- p. Any and all statements regarding and or related to any unwritten, uncodified and unspoken customs and or norms of the Jackson Police Department.

2. The above-referenced statements are relevant to Plaintiffs' claim in this instant action.

Specifically, the statements are directly related to Count II of the Amended Complaint.

The Estate of Crystalline Barnes, et, al  
Plaintiffs

By: /s/ Tiffani S. Collins, Esq.  
Tiffani S. Collins, Pro Hac Vice

OF COUNSEL:

Carlos E. Moore, MSB# 100685  
THE COCHRAN FIRM  
306 Branscome Drive  
PO BOX 1487  
Grenada, MS 38902-1487  
O: (662) 227-9940  
F: (662) 227-9941  
cmoore@cochranfirm.com  
*Counsel for Plaintiff*

OF COUNSEL:

Tiffani S. Collins, Esq.  
Collins Legal Group, LLC  
20 S. Charles Street, Suite 901  
Baltimore, Maryland 21201  
O: (410) 462-4529  
F: (410) 995-7200  
tiffani@tcollinslaw.com  
*Counsel for Plaintiffs*

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF  
MISSISSIPPI  
JACKSON – NOTHERN DIVISION

THE ESTATE OF CYRSTALLINE BARNES  
ET AL.

PLAINTIFFS

V.

CIVIL ACTION NO.: 18-644

OFFICER RAKASHA ADAMS  
ET AL.

DEFENDANTS

**CERTIFICATE OF SERVICE**

I hereby certify that on this 18th day of December 2019, I caused a copy of the Line to  
be served via electronic filing (“ECF”) upon all counsel of record.

By: /s/Tiffani S. Collins, Esq.  
Tiffani S. Collins, Pro Hac Vice